

Comments on the Executive Summary of the Blue Ribbon Commission on America's Nuclear Future, July 29, 2011

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Overall, we are confident that our waste management recommendations can be implemented using revenue streams *already dedicated for this purpose* (i.e., the Nuclear Waste Fund and fee). **Not shown that these funds are sufficient and impossible to do so while the siting, building and loading of the repository are unknown.**

The Act should be modified to allow for multiple storage facilities with adequate capacity to be sited, licensed, and constructed when needed **irrespective of the status of the repository development.**

Legislation will be needed to (1) move this responsibility to a new, independent, government-chartered corporation solely focused on managing spent nuclear fuel and high-level radioactive wastes and (2) to establish the appropriate oversight mechanisms. **Movement but is it progress?**

Congress may need to provide policy direction and new legislation to implement some measures aimed at helping other countries manage radioactive wastes in a safe, secure, and proliferation-resistant manner. **Hubris considering how troubled the US program has been.**

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Finding sites where all affected units of government, including the host state or tribe, regional and local authorities, and the host community, are willing to support or at least accept a facility has proved exceptionally difficult. **Not tried!**

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Siting New Nuclear Waste Management Facilities – Getting Started Present program!

The United States should begin siting new nuclear waste management facilities by:

- ***Developing a set of basic initial siting criteria*** – These criteria will ensure that time is not wasted investigating sites that are clearly unsuitable or inappropriate.
- ***Developing a generic standard and supporting regulatory requirements early in the siting process*** - Generally-applicable regulations are more likely to earn public confidence than site-specific standards. In addition, having a generic standard will support the efficient consideration and examination of multiple sites.
- ***Encouraging expressions of interest from a large variety of communities that have potentially suitable sites*** - As these communities become engaged in the process, the implementing organization must be flexible enough not to force the issue of consent while also being fully prepared to take advantage of promising opportunities when they arise.
- ***Establishing initial program milestones*** - Milestones should be laid out in a mission plan to

allow for review by Congress, the Administration, and stakeholders, and to provide verifiable indicators for oversight of the organization's performance. **Set criteria that are reasonably possible of achievement and not oversight for 1 million years.**

Transparency, flexibility, patience, responsiveness, and a heavy emphasis on consultation and cooperation will all be necessary—indeed, these are attributes that should apply not just to siting but to every aspect of program implementation. **Allow to opt out at any stage**

Without imposing inflexible deadlines, it will still be important to **set reasonable performance goals** **Such as?** and milestones so that Congress can hold the waste management organization accountable and so that stakeholders can have confidence the program is moving forward.

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For this and **other reasons**, **such as?** the Commission concludes that new institutional leadership is needed. Specifically, we believe a single-purpose, Congressionally-chartered federal corporation **is best suited why?** To provide the stability, focus, and credibility needed to get the waste program back on track.

In addition, the presence of clearly independent, competent regulators is essential; we recommend the existing roles of the U.S. Environmental Protection Agency and the Nuclear Regulatory Commission (NRC) regarding long-term repository performance be preserved but that steps be taken to improve coordination between these agencies. **and so that their requirements are not contradictory.**

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Longer term, the possibility exists to advance **"game-changing"** **Such as?** innovations that offer potentially large advantages over current technologies and systems.

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Future evaluations of potential alternative fuel cycles must account for linkages among all elements of the fuel cycle (including waste transportation, interim storage, and disposal) and for broader safety, security, and non-proliferation concerns. **Too bad they were not willing to discuss the non-proliferating fuel cycle that I recommended be considered.**

Second, the United States cannot exercise effective leadership on issues related to the back end of the nuclear fuel cycle so long as its own program is in disarray; effective domestic policies are needed to support America's international agenda. non—sequiter.

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To be sure, decades of failed efforts to develop a repository for spent fuel and high-level waste

have produced frustration and a deep erosion of trust in the federal government. **For many other reasons as well.** But they have also produced important insights, a clearer understanding of the technical and social issues to be resolved, and at least one success story – the WIPP facility in New Mexico. **In part due to the effective State of New Mexico oversight-EEG.** Moreover, many people have looked at aspects of this record and come to similar conclusions. **such as?**